

1 KRISTIN K. MAYES  
2 Attorney General of Arizona  
(Firm State Bar No. 14000)  
3 Laura Dilweg (AZ Bar No. 036066)  
Dylan Jones (AZ Bar No. 034185)  
4 Joseph Hubble (AZ No. 037113)  
Office of the Arizona Attorney General  
5 2005 North Central Avenue  
Phoenix, AZ 85004  
6 Phone: (602) 542-3725  
Fax: (602) 542-4377  
7 [consumer@azag.gov](mailto:consumer@azag.gov)  
8 *Lead Counsel for Plaintiffs*  
9

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**

13 State of Arizona, *ex rel.* Kristin K. Mayes,  
14 Attorney General; State of Alabama *ex rel.*  
15 Attorney General Steve Marshall; State of  
Arkansas, *ex rel.* Tim Griffin; People of the  
16 State of California *ex rel.* Rob Bonta, Attorney  
General of California; State of Colorado; State  
of Connecticut; State of Delaware *ex rel.*  
17 Kathleen Jennings, Attorney General of the  
State of Delaware; District of Columbia; Office  
18 of the Attorney General, State of Florida,  
Department of Legal Affairs; State of Georgia,  
19 *ex rel.* Christopher M. Carr, Attorney General  
of the State of Georgia; State of Hawaii; State  
of Idaho, through Attorney General Raúl R.  
20 Labrador; People of the State of Illinois; State  
of Indiana; State of Iowa *ex rel.* Brenna Bird,  
Attorney General of Iowa; State of Kansas;  
21 Commonwealth of Kentucky; State of  
Louisiana; State of Maine; Maryland Office of  
the Attorney General; Commonwealth of  
22 Massachusetts; People of the State of  
Michigan; State of Minnesota, by its Attorney  
General, Keith Ellison; State of Mississippi *ex*  
*rel.* Attorney General Lynn Fitch; State of

23 NO. CV-23-00233-TUC-CKJ

24 **APPLICATION FOR CLERK'S  
ENTRY OF DEFAULT**

1 Missouri, ex. rel. Andrew Bailey, Attorney  
2 General; State of Montana; State of Nebraska,  
3 *ex rel.* Michael T. Hilgers, Attorney General;  
4 State of Nevada; State of New Hampshire;  
5 State of New Jersey; State of New Mexico, *ex*  
6 *rel.* Raúl Torrez, Attorney General; People of  
7 the State of New York, by Letitia James,  
8 Attorney General of the State of New York;  
9 State of North Carolina, *ex rel.* Attorney  
10 General Joshua H. Stein; State of North Dakota,  
11 *ex rel.* Drew H. Wrigley, Attorney General;  
12 State of Ohio *ex rel.* Attorney General Dave  
13 Yost; State of Oklahoma *ex rel.* Attorney  
14 General Gentner Drummond; State of Oregon,  
15 *ex rel.* Ellen F. Rosenblum, Attorney General  
16 for the State of Oregon; Commonwealth of  
17 Pennsylvania, by Attorney General Michelle A.  
Henry; State of Rhode Island; State of South  
Carolina ex. rel. Attorney General Alan  
Wilson; State of Tennessee; State of Texas;  
Utah Division of Consumer Protection; State of  
Vermont; Commonwealth of Virginia, *ex rel.*  
Jason S. Miyares, Attorney General; State of  
Washington; State of West Virginia *ex rel.*  
Patrick Morrisey, Attorney General; State of  
Wisconsin; and State of Wyoming,

18 Plaintiffs;

19 v.  
20

21 Michael D. Lansky, L.L.C., dba Avid Telecom;  
22 an Arizona limited liability company;

23 Michael D. Lansky, individually as a Member/  
24 Manager/Chief Executive Officer of Michael  
D. Lansky, L.L.C., dba Avid Telecom; and

25 Stacey S. Reeves, individually as a  
26 Manager/Vice President of Michael D. Lansky,  
27 L.L.C., dba Avid Telecom,

28 Defendants.

1        Plaintiffs respectfully request the Clerk of Court's Entry of Default against  
2 Defendants Michael D. Lansky, L.L.C, dba Avid Telecom ("Avid Telecom"), Michael D.  
3 Lansky ("Lansky"), and Stacey S. Reeves ("Reeves") (collectively, "Defendants"),  
4 pursuant to Federal Rule of Civil Procedure 55(a), for failure to answer or otherwise  
5 timely defend this action after Defendants waived service. In support of this request,  
6 Plaintiffs show:

7            1.      On May 23, 2023, Plaintiffs filed their complaint against Defendants.  
8 ECF No. 1.

9            2.      On May 23, 2023, Plaintiffs mailed waivers of service to Defendants.  
10            3.      On June 13, 2023, Plaintiffs, through the State of Arizona, filed a Waiver  
11 of Service for Defendant Reeves. ECF No. 11.

12            4.      On June 20, 2023, Plaintiffs, through the State of Arizona, filed a Waiver  
13 of Service for Defendants Lansky and Avid Telecom. ECF No. 12.

14            5.      On June 20, 2023, Lee Stein filed a Notice of Appearance on behalf of  
15 Defendant Reeves. ECF No. 13.

16            6.      The original answer date for all Defendants was July 24, 2023.

17            7.      On July 10, 2023, Defendant Reeves, through Mr. Stein, filed the First  
18 Motion for Extension of Time to File Answer ("First MTE"). ECF No. 14.

19            8.      The First MTE was said to be filed on behalf of all Defendants.

20            9.      At the top of the First MTE, Neil S. Ende, Esq., managing partner of the  
21 Technology Law Group, LLC in Washington, DC, was identified as representing  
22 Defendants Lansky and Avid Telecom. Further, the First MTE expressly stated "Pro  
23 Hac Vice motion to be filed." ECF No. 14.

24            10.     The First MTE was unopposed by Plaintiffs.

25            11.     On July 20, 2023, Mr. Stein filed a Motion to Withdraw as Attorney for  
26 Defendant Reeves. ECF No. 15.

27            12.     On July 24, 2023, the Court granted the First Motion for Extension of  
28 Time to File Answer, setting a response date of September 7, 2023. ECF No. 16.

1       13. On July 24, 2023, the Court granted Mr. Stein's Motion to Withdraw as  
2 Attorney. ECF No. 17.

3       14. Before and since July 24, 2023, Plaintiffs, through counsel for the lead  
4 states of Arizona, Indiana, North Carolina, and Ohio, have spoken with Mr. Ende and  
5 Matt Albaugh about the Plaintiffs' complaint and case.

6       15. Mr. Ende has stated in conversations with Plaintiffs' counsel for the states  
7 of Arizona, Indiana, North Carolina, and Ohio that he represents all Defendants in this  
8 action.

9       16. Mr. Albaugh, who is a partner at Taft Stettinius & Hollister LLP in  
10 Indianapolis, Indiana, has stated in conversations with Plaintiffs' counsel for the states  
11 of Arizona, Indiana, North Carolina, and Ohio that he represents only Defendant Avid  
12 Telecom.

13       17. At the time of this filing, the docket reflects that Defendants do not have  
14 any attorney who has filed a notice of appearance on their behalf in this matter or an  
15 attorney who did not subsequently withdraw.

16       18. The docket reflects that Defendant Reeves is pro se.

17       19. A *pro hac vice* application was granted for Mr. Ende by this Court on  
18 April 6, 2023, but only as to Mr. Ende's appearance in case No. CV-22-00558-TUC-  
19 JCH, which is a different proceeding in the United States District Court for the District  
20 of Arizona that involves Defendants Avid Telecom and Lansky.

21       20. "It has been the law for the better part of two centuries ... that a  
22 corporation may appear in the federal courts only through licensed counsel." *Rowland*  
23 v. *California Men's Colony, Unit II Men's Advisory Council*, 506 U.S. 194, 201-02,  
24 113 S.Ct. 716, 121 L.Ed.2d 656 (1993); see also, e.g., *In re Highley*, 459 F.2d 554,  
25 555 (9th Cir. 1972) ("A corporation can appear in a court proceeding only through an  
26 attorney at law."); *Russell v. United States*, 308 F.2d 78, 79 (9th Cir. 1962). "[T]he  
27 purpose of the rule requiring corporations to appear by an attorney is to ensure that the  
28 court has greater control over the management and administration of the case."

1       21. All Defendants have waived service, and these waivers have been filed  
2 with the Court. ECF Nos. 11 and 12.

3       22. Defendants requested and were granted an extension to file a response  
4 and answer by September 7, 2023. ECF No. 16.

5       23. On September 7, 2023, at 6:42 PM Eastern (3:42 PM Pacific), Mr.  
6 Albaugh emailed lead counsel for Arizona, Indiana, North Carolina, and Ohio to  
7 request an extension of thirty (30) days. Mr. Ende was copied on the email.

8       24. On September 7, 2023, at 8:19 PM Eastern (5:19 PM Pacific), lead  
9 counsel for Arizona, Indiana, North Carolina, and Ohio emailed Mr. Albaugh and Mr.  
10 Ende, declining the last-minute request for an extension because a further delay is  
11 unwarranted, as Plaintiffs do not believe Defendants have demonstrated they are  
12 interested in resolving this matter by agreement within the next thirty days.

13       25. Defendants did not file an answer or response on or before September 7,  
14 2023.

15       26. Defendants have “failed to plead or otherwise defend” this suit, and this  
16 has been shown through motion. Fed R. Civ. P. 55(a).

17       For the foregoing reasons, Plaintiffs respectfully request the Clerk of Court enter  
18 a default against Defendants Michael D. Lansky, L.L.C, dba Avid Telecom, Michael D.  
19 Lansky, and Stacey S. Reeves pursuant to Rule 55(a) of the Federal Rules of Civil  
20 Procedure.

21  
22       RESPECTFULLY SUBMITTED DATED this 8th day of September, 2023.  
23  
24  
25  
26  
27  
28

1 **FOR THE STATE OF ARIZONA:**

2 KRISTIN K. MAYES  
3 Attorney General for the State of  
4 Arizona

5 /s/ Laura Dilweg  
6 LAURA DILWEG  
7 DYLAN JONES  
8 JOSEPH HUBBLE  
9 Assistant Attorneys General  
*Attorneys for the State of Arizona*

10 **FOR THE STATE OF INDIANA:**

11 TODD ROKITA  
12 Attorney General for the State of Indiana

13 /s/ Joseph Yeoman  
14 DOUGLAS S. SWETNAM  
15 JOSEPH D. YEOMAN  
16 Deputy Attorneys General  
17 *Attorneys for the State of Indiana*

18 **FOR THE STATE OF NORTH  
CAROLINA:**

19 JOSHUA H. STEIN  
20 Attorney General for the State of North  
21 Carolina

22 /s/ Tracy Nayer  
23 TRACY NAYER  
24 ASA EDWARDS  
25 Special Deputy Attorneys General  
26 DANIELLE WILBURN ALLEN  
27 Assistant Attorney General  
*Attorneys for the State of North Carolina*

28 **FOR THE STATE OF OHIO:**

1 DAVE YOST  
2 Attorney General for the State of Ohio

3 /s/ Erin Leahy  
4 ERIN B. LEAHY  
5 Senior Assistant Attorney General  
6 *Attorney for the State of Ohio*

7 *Lead Counsel for Plaintiffs*

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2023, I caused the foregoing to be filed and served electronically via the Court's CM/ECF system upon counsel of record. For parties whose counsel have not yet entered an appearance, copies of this motion have been served via certified mail and electronic mail to:

**For Defendants Michael D. Lansky, L.L.C, dba Avid Telecom,  
Michael D. Lansky, and Stacey S. Reeves**

Neil S. Ende, Esq.  
Managing Partner  
Technology Law Group, L.L.C.  
5335 Wisconsin Avenue, NW  
Suite 440  
Washington, DC 20015  
202-895-1707  
[nende@tlgdc.com](mailto:nende@tlgdc.com)

**For Defendant Michael D. Lansky, L.L.C, dba Avid Telecom**

Matt Albaugh  
Partner  
Taft Stettinius & Hollister LLP  
One Indiana Square, Suite 3500  
Indianapolis, IN 46204  
317-713-3490  
[Malbaugh@taftlaw.com](mailto:Malbaugh@taftlaw.com)

/s/ Joseph D. Yeoman

Joseph D. Yeoman

## **LIST OF PLAINTIFFS' COUNSEL**

Laura Dilweg (AZ Bar No. 036066)  
Dylan Jones (AZ Bar No. 034185)  
Joseph Hubble (AZ No. 037113)  
Assistant Attorneys General  
Arizona Attorney General's Office  
2005 North Central Avenue  
Phoenix, AZ 85004  
Phone: (602) 542-3725  
Fax: (602) 542-4377  
[consumer@azag.gov](mailto:consumer@azag.gov)  
[laura.dilweg@azag.gov](mailto:laura.dilweg@azag.gov)  
*Attorneys for Plaintiff State of Arizona*

Douglas S. Swetnam (IN Bar No. 15860-49)  
Joseph D. Yeoman (IN Bar No. 35668-29)  
Deputy Attorneys General  
Office of the Indiana Attorney  
General Todd Rokita  
Indiana Govt. Center South, 5th Fl.  
302 W. Washington St.  
Indianapolis, IN 46204-2770  
Phone: (317) 232-6294 (Swetnam)  
          (317) 234-1912 (Yeoman)  
Fax:    (317) 232-7979  
[douglas.swetnam@atg.in.gov](mailto:douglas.swetnam@atg.in.gov)  
[joseph.yeoman@atg.in.gov](mailto:joseph.yeoman@atg.in.gov)  
*Attorneys for Plaintiff State of Indiana*

Tracy Nayer (NC Bar No. 36964)  
Asa Edwards (NC Bar No. 46000)  
Special Deputy Attorneys General  
Danielle Wilburn Allen (NC Bar No. 58141)  
Assistant Attorney General  
North Carolina Department of Justice  
Consumer Protection Division  
P.O. Box 629  
Raleigh, North Carolina 27602  
Phone: (919) 716-6000  
Fax: (919) 716-6050  
[tnayer@ncdoj.gov](mailto:tnayer@ncdoj.gov)  
[aedwards@ncdoj.gov](mailto:aedwards@ncdoj.gov)  
[dwilburnallen@ncdoj.gov](mailto:dwilburnallen@ncdoj.gov)  
*Attorneys for Plaintiff State of  
North Carolina*

Erin B. Leahy (OH Bar No. 0069509)  
Senior Assistant Attorney General  
Office of Attorney General Dave Yost  
30 East Broad Street, 14th Fl.  
Columbus, OH 43215  
Phone: (614) 752-4730  
Fax: (866) 768-2648  
[Erin.Leahy@OhioAGO.gov](mailto:Erin.Leahy@OhioAGO.gov)  
*Attorney for Plaintiff State of Ohio*

*Lead Counsel for Plaintiffs*

1 Lindsay D. Barton (AL Bar No. 1165-G00N)  
 2 Robert D. Tambling (AL Bar No. 6026-N67R)  
 3 Assistant Attorneys General  
 4 Office of the Alabama Attorney General  
 5 501 Washington Avenue  
 6 Montgomery, Alabama 36130  
 7 Phone: (334) 353-2609 (Dawson)  
     (334) 242-7445 (Tambling)  
 8 Fax: (334) 353-8400  
[Lindsay.Barton@AlabamaAG.gov](mailto:Lindsay.Barton@AlabamaAG.gov)  
[Robert.Tambling@AlabamaAG.gov](mailto:Robert.Tambling@AlabamaAG.gov)

9 *Attorneys for Plaintiff State of Alabama*

10 Amanda Wentz (AR Bar No. 2021066)  
 11 Assistant Attorney General  
 12 Office of Attorney General Tim Griffin  
 13 323 Center St., Ste. 200  
 14 Little Rock, AR 72201  
 15 Phone: (501) 682-1178  
 16 Fax: (501) 682-8118  
[Amanda.wentz@arkansasag.gov](mailto:Amanda.wentz@arkansasag.gov)

17 *Attorney for Plaintiff State of Arkansas*

18 Nicklas A. Akers (CA Bar No. 211222)  
 19 Senior Assistant Attorney General  
 20 Bernard A. Eskandari (CA Bar No. 244395)  
 21 Supervising Deputy Attorney General  
 22 Timothy D. Lundgren (CA Bar No. 254596)  
 23 Rosailda Perez (CA Bar No. 284646)  
 24 Deputy Attorneys General  
 25 Office of the California Attorney General  
 26 300 S. Spring St., Suite 1702  
 27 Los Angeles, CA 90013  
 28 Phone: (415) 510-3364 (Akers)  
     (213) 269-6348 (Eskandari)  
     (213) 269-6355 (Lundgren)  
     (213) 269-6612 (Perez)  
 Fax: (916) 731-2146

[nicklas.akers@doj.ca.gov](mailto:nicklas.akers@doj.ca.gov)  
[bernard.eskandari@doj.ca.gov](mailto:bernard.eskandari@doj.ca.gov)  
[timothy.lundgren@doj.ca.gov](mailto:timothy.lundgren@doj.ca.gov)  
[rosailda.perez@doj.ca.gov](mailto:rosailda.perez@doj.ca.gov)

29 *Attorneys for Plaintiff People of the  
 30 State of California*

31 Michel Singer Nelson (CO Bar No. 19779)  
 32 Assistant Attorney General II  
 33 Bianca Feierstein (CO Bar No. 56653)  
 34 Assistant Attorney General  
 35 Colorado Office of the Attorney General  
 36 Ralph L. Carr Judicial Building  
 37 1300 Broadway, 10th Floor  
 38 Denver, CO 80203  
 39 Phone:(720) 508-6220 (Singer Nelson)  
     (720) 508-6246 (Feierstein)  
[michel.singernelson@coag.gov](mailto:michel.singernelson@coag.gov)  
[bianca.feierstein@coag.gov](mailto:bianca.feierstein@coag.gov)

40 *Attorneys for Plaintiff State of Colorado,  
 41 ex rel. Philip J. Weiser, Attorney General*

42 Brendan Flynn (Fed. Bar No. ct04545,  
 43 CT Bar No. 419935)  
 44 Assistant Attorney General  
 45 Office of the Connecticut Attorney General  
 46 William Tong  
 47 165 Capitol Avenue, Suite 4000  
 48 Hartford, CT 06106  
 49 Phone:(860) 808-5400  
 50 Fax: (860) 808-5593  
[brendan.flynn@ct.gov](mailto:brendan.flynn@ct.gov)

51 *Attorney for Plaintiff State of Connecticut*

52 Ryan Costa (DE Bar No. 5325)  
 53 Dashiell Radosti (DE Bar No. 7100)  
 54 Deputy Attorneys General  
 55 Delaware Department of Justice  
 56 820 N. French Street, 5th Floor  
 57 Wilmington, DE 19801  
 58 Phone:(302) 683-8811 (Costa)  
     (302) 683-8812 (Radosti)  
 59 Fax: (302) 577-6499  
[Ryan.costa@delaware.gov](mailto:Ryan.costa@delaware.gov)  
[Dashiell.radosti@delaware.gov](mailto:Dashiell.radosti@delaware.gov)

60 *Attorneys for Plaintiff State of Delaware*

1 Adam Teitelbaum (DC Bar No. 1015715)  
2 Director, Office of Consumer Protection  
3 Assistant Attorney General  
4 D.C. Office of the Attorney General  
5 Office of Consumer Protection  
6 400 6th Street NW, 10th Floor  
Washington, DC 20001  
Phone: (202) 741-0764  
[Adam.Teitelbaum@dc.gov](mailto:Adam.Teitelbaum@dc.gov)  
*Attorney for Plaintiff District of Columbia*

7 Patrick Crotty (FL Bar No. 108541)  
8 Senior Assistant Attorney General  
9 Miles Vaughn (FL Bar No. 1032235)  
Assistant Attorney General  
10 Office of the Florida Attorney General  
Consumer Protection Division  
11 3507 E. Frontage Rd, Suite 325  
Tampa, FL 33607  
Phone: (813) 287-7950  
Fax: (813) 281-5515  
[patrick.crotty@myfloridalegal.com](mailto:patrick.crotty@myfloridalegal.com)  
[miles.vaughn@myfloridalegal.com](mailto:miles.vaughn@myfloridalegal.com)  
*Attorneys for Plaintiff Ashley Moody,  
Attorney General of the State of Florida*

12 David A. Zisook (GA Bar No. 310104)  
Senior Assistant Attorney General  
13 Office of the Attorney General of the State of  
Georgia  
2 Martin Luther King Jr. Drive, SE, Ste. 356  
Atlanta, GA 30334  
Phone: (404) 458-4294  
Fax: (404) 464-8212  
[dzisook@law.ga.gov](mailto:dzisook@law.ga.gov)  
*Attorney for Plaintiff State of Georgia*

14 Christopher J.I. Leong (HI Bar No. 9662)  
Deputy Attorney General  
Hawaii Department of the Attorney General  
425 Queen Street  
Honolulu, HI 96813  
Phone: (808) 586-1180  
Fax: (808) 586-1205  
[christopher.ji.leong@hawaii.gov](mailto:christopher.ji.leong@hawaii.gov)  
*Attorney for Plaintiff State of Hawaii*

15 Stephanie N. Guyon (ID Bar No. 5989)  
Deputy Attorney General  
Idaho Attorney General's Office  
P.O. Box 83720  
Boise, ID 83720-0010  
Phone: (208) 334-4135  
Fax: (208) 334-4151  
[stephanie.guyon@ag.idaho.gov](mailto:stephanie.guyon@ag.idaho.gov)  
*Attorney for Plaintiff State of Idaho*

16 Philip Heimlich (IL Bar No. 6286375)  
Assistant Attorney General  
Elizabeth Blackston (IL Bar No. 6228859)  
Consumer Fraud Bureau Chief  
Office of the Illinois Attorney General  
500 S. Second Street  
Springfield, IL 62791  
Phone: (217) 782-4436  
[philip.heimlich@ilag.gov](mailto:philip.heimlich@ilag.gov)  
[elizabeth.blackston@ilag.gov](mailto:elizabeth.blackston@ilag.gov)  
*Attorneys for Plaintiff People of the  
State of Illinois*

17 Benjamin Bellus (IA Bar No. AT0000688)  
William Pearson (IA Bar No. AT0012070)  
Assistant Attorneys General  
Office of the Iowa Attorney General  
1305 E. Walnut St.  
Des Moines, IA 50319  
Phone: (515) 242-6536 (Bellus)  
(515) 242-6773 (Pearson)  
Fax: (515) 281-6771  
[Benjamin.Bellus@ag.iowa.gov](mailto:Benjamin.Bellus@ag.iowa.gov)  
[William.Pearson@ag.iowa.gov](mailto:William.Pearson@ag.iowa.gov)  
*Attorneys for Plaintiff State of Iowa*

1 Sarah M. Dietz (KS Bar No. 27457)  
2 Assistant Attorney General  
3 Office of the Kansas Attorney General  
120 SW 10th Avenue  
Topeka, KS 66612  
4 Phone: (785) 296-3751  
Fax: (785) 291-3699  
[sarah.dietz@ag.ks.gov](mailto:sarah.dietz@ag.ks.gov)  
5 *Attorney for Plaintiff State of Kansas*

7 Donald J. Haas (KY Bar No. 94090)  
8 Assistant Attorney General  
9 Office of the Attorney General,  
Commonwealth of Kentucky  
1024 Capital Center Drive, Ste. 200  
Frankfort, KY 40601  
Phone: (502) 696-5612  
Fax: (502) 573-8317  
[donald.haas@ky.gov](mailto:donald.haas@ky.gov)

13 *Attorney for Plaintiff Commonwealth of Kentucky*

14 Cathryn E. Gits (LA Bar No. 35144)  
15 Assistant Attorney General  
16 Office of the Attorney General Jeff Landry  
1885 North Third St.  
Baton Rouge, LA 70802  
Phone: (225) 326-6414  
Fax: (225) 326-6499  
[gitsc@ag.louisiana.gov](mailto:gitsc@ag.louisiana.gov)  
19 *Attorney for Plaintiff State of Louisiana*

21 Laura Lee Barry Womack (ME Bar No.  
010110)  
22 Assistant Attorney General  
23 Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333  
Phone: (207) 626-8800  
[Lauralee.barrywommack@maine.gov](mailto:Lauralee.barrywommack@maine.gov)  
26 *Attorney for Plaintiff Aaron M. Frey,  
Attorney General*

Philip Ziperman (Fed. Bar No. 12430)  
Deputy Counsel  
Kathleen P. Hyland (Fed. Bar No. 30075)  
Assistant Attorney General  
Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202  
Phone: (410) 576-6417 (Ziperman)  
(410) 576-7057 (Hyland)  
Fax: (410) 576-6566  
[pziperman@oag.state.md.us](mailto:pziperman@oag.state.md.us)  
[khyland@oag.state.md.us](mailto:khyland@oag.state.md.us)  
8 *Attorneys for Plaintiff Maryland Office of  
the Attorney General*

Elizabeth Cho (MA Bar No. 672556)  
Assistant Attorney General  
Massachusetts Office of the Attorney General  
One Ashburton Place, 18th Floor  
Boston, MA 02108  
Phone: (617) 963-2608  
Fax: 617-727-5765  
[Elizabeth.Cho@mass.gov](mailto:Elizabeth.Cho@mass.gov)  
7 *Attorney for Plaintiff Commonwealth of  
Massachusetts*

Kathy P. Fitzgerald (MI Bar No. P31454)  
Michael S. Hill (MI Bar No. P73084)  
Assistant Attorneys General  
Michigan Department of Attorney General  
Corporate Oversight Division  
P.O. Box 30736  
Lansing, MI 48909  
Phone: (517) 335-7632  
Fax: (517) 335-6755  
[fitzgeraldk@michigan.gov](mailto:fitzgeraldk@michigan.gov)  
[Hillm19@michigan.gov](mailto:Hillm19@michigan.gov)  
6 *Attorneys for Plaintiff People of the State of  
Michigan*

1 Bennett Hartz (MN Bar No. 0393136)  
2 Assistant Attorney General  
3 Office of the Minnesota Attorney General  
4 445 Minnesota Street, Suite 1200  
5 Saint Paul, MN 55404  
6 Phone: (651) 757-1235  
[bennett.hartz@ag.state.mn.us](mailto:bennett.hartz@ag.state.mn.us)  
7 *Attorney for Plaintiff State of Minnesota,  
by its Attorney General, Keith Ellison*

8 James M. Rankin (MS Bar No. 102332)  
9 Special Assistant Attorney General  
10 Mississippi Attorney General's Office  
11 P.O. Box 220  
12 Jackson, MS 39205  
13 Phone: (602) 359-4258  
[james.rankin@ago.ms.gov](mailto:james.rankin@ago.ms.gov)  
14 *Attorney for Plaintiff Lynn Fitch,  
15 Attorney General State of Mississippi*

16 Michael Schwalbert (MO Bar No. 63299)  
17 Assistant Attorney General  
18 Office of the Missouri Attorney General  
19 815 Olive Street, Suite 200  
20 St. Louis, MO 63101  
21 Phone: (314) 340-6816  
22 Fax: (314) 340-7891  
[michael.schwalbert@ago.mo.gov](mailto:michael.schwalbert@ago.mo.gov)  
23 *Attorney for Plaintiff State of Missouri,  
ex. rel. Andrew Bailey, Attorney General*

24 Anna Schneider (MT Bar No. 13963)  
25 Bureau Chief  
26 Andrew Butler (MT Bar No. 53936812)  
27 Assistant Attorney General  
28 Montana Attorney General's Office  
Office of Consumer Protection  
555 Fuller Avenue  
Helena, MT 59601  
Phone: (406)444-4500  
[Anna.schneider@mt.gov](mailto:Anna.schneider@mt.gov)  
[Andrew.butler@mt.gov](mailto:Andrew.butler@mt.gov)  
*Attorneys for Plaintiff State of Montana*

Michaela J. Hohwieler (NE Bar No. 26826)  
Assistant Attorney General  
Office of the Attorney General Michael T.  
Hilgers

2115 State Capitol Building  
Consumer Protection Division  
Lincoln, NE 68509  
Phone: (402) 471-1928  
Fax: (402) 471-4725  
[Michaela.hohwieler@nebraska.gov](mailto:Michaela.hohwieler@nebraska.gov)  
*Attorney for Plaintiff State of Nebraska*

Michelle C. Newman (NV Bar No. 13206)  
Senior Deputy Attorney General  
Office of the Nevada Attorney General  
Bureau of Consumer Protection  
100 North Carson Street  
Carson City, NV 89701-4717  
Phone: (775) 684-1164  
Fax: (775) 684-1299  
[MNewman@ag.nv.gov](mailto:MNewman@ag.nv.gov)  
*Attorney for Plaintiff State of Nevada*

Mary F. Stewart (NH Bar No. 10067)  
Assistant Attorney General  
New Hampshire Department of Justice  
Office of the Attorney General  
Consumer Protection and Antitrust Bureau  
33 Capitol St.  
Concord, NH 03301-6397  
Phone: (603) 271-1139  
Fax: (603) 271-2110  
[Mary.F.Stewart@doj.nh.gov](mailto:Mary.F.Stewart@doj.nh.gov)  
*Attorney for Plaintiff State of New Hampshire*

1 Deepta Janardhan (NJ Bar No. 309022020)  
2 Jeffrey Koziar (NJ Bar No. 015131999)  
3 Deputy Attorneys General  
4 New Jersey Office of the Attorney General  
5 Division of Law  
6 124 Halsey Street  
7 Newark, NJ 07101  
8 Phone: (973) 648-7819  
9 Fax: (973) 648-4887  
10 [Jeff.koziar@law.njoag.gov](mailto:Jeff.koziar@law.njoag.gov)

11 *Attorneys for Plaintiff State of New Jersey*

12 Jacqueline Ortiz (NM Bar No. 146309)  
13 Assistant Attorney General  
14 State of New Mexico Office of the  
15 Attorney General  
16 408 Galisteo St.  
17 Santa Fe, New Mexico 87501  
18 Phone: (505)490-4060  
19 Fax: (505) 490-4883  
20 [Jortiz@nmag.gov](mailto:Jortiz@nmag.gov)

21 *Attorney for Plaintiff Raúl Torrez,  
22 New Mexico Attorney General*

23 Glenna Goldis (NY Bar No. 4868600)  
24 Assistant Attorney General  
25 Office of the New York State  
26 Attorney General  
27 28 Liberty Street  
28 New York, NY 10005  
Phone: (646)856-3697  
[Glenna.goldis@ag.ny.gov](mailto:Glenna.goldis@ag.ny.gov)

29 *Attorney for Plaintiff Office of the Attorney  
30 General of the State of New York*

31 Parrell D. Grossman (ND Bar No. 04684)  
32 Director, Consumer Protection & Antitrust  
33 Division

34 Elin S. Alm (ND Bar No. 05924)  
35 Assistant Attorney General  
36 Office of North Dakota Attorney General  
37 Consumer Protection & Antitrust Division  
38 1720 Burlington Drive, Suite C  
39 Bismarck, ND 58504-7736  
40 Phone: (701) 328-5570  
41 Fax: (701) 328-5568

42 [pgrossman@nd.gov](mailto:pgrossman@nd.gov)  
[alm@nd.gov](mailto:alm@nd.gov)

43 *Attorneys for Plaintiff State of North Dakota*

44 Matthew E. Willoughby (OK Bar No. 33305)  
45 Assistant Attorney General  
46 Office of the Oklahoma Attorney General  
47 313 N.E. 21st St.  
48 Oklahoma City, OK 73105  
49 Phone: (405) 522-2966  
50 Fax: (405) 522-0085

51 [Matthew.Willoughby@oag.ok.gov](mailto:Matthew.Willoughby@oag.ok.gov)

52 *Attorney for Plaintiff State of Oklahoma  
53 ex rel. Attorney General Gentner Drummond*

54 Jordan M. Roberts (OR Bar No. 115010)  
55 Senior Assistant Attorney General  
56 Oregon Department of Justice  
57 Consumer Protection Division  
58 100 SW Market St.  
59 Portland, OR 97201  
60 Phone: (971) 673-1880  
61 Fax: (971) 673-1884  
[jordan.m.roberts@doj.state.or.us](mailto:jordan.m.roberts@doj.state.or.us)

62 *Attorney for Plaintiff State of Oregon*

1 Brandon J. Bingle (PA Bar No. 209133)  
2 Senior Deputy Attorney General  
3 Office of Attorney General  
4 Michelle A. Henry  
5 Strawberry Square, 15th Floor  
Harrisburg, PA 17120-0001  
Phone: (814) 878-5858  
Fax: (717) 705-3795  
[bbingle@attorneygeneral.gov](mailto:bbingle@attorneygeneral.gov)

6 *Attorney for Plaintiff Commonwealth of  
Pennsylvania by Attorney General*  
7 *Michelle A. Henry*

8  
9 Stephen N. Provazza (RI Bar No. 10435)  
Special Assistant Attorney General  
10 Rhode Island Office of the Attorney General  
11 150 S. Main Street  
Providence, RI 02903  
Phone: (401) 274-4400, ext. 2476  
Fax: (401) 222-1766  
[sprovazza@riag.ri.gov](mailto:sprovazza@riag.ri.gov)

12 *Attorney for Plaintiff State of Rhode Island,  
by Attorney General Peter Neronha*

13  
14 Kristin Simons (SC Bar No. 74004)  
Senior Assistant Attorney General  
15 Danielle Robertson (SC Bar No. 105846)  
Assistant Attorney General  
16 South Carolina Attorney General's Office  
17 P.O. Box 11549  
Columbia, SC 29211-1549  
Phone: (803) 734-6134 (Simons)  
          (803) 734-8044 (Robertson)

18 [ksimmons@scag.gov](mailto:ksimmons@scag.gov)  
[danirobertson@scag.gov](mailto:danirobertson@scag.gov)

19 *Attorneys for Plaintiff State of  
South Carolina*

20 Austin C. Ostiguy (TN Bar No. 040301)  
Tyler T. Corcoran (TN Bar No. 038887)  
Assistant Attorneys General  
21 Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202  
Phone: (615) 532-7271 (Ostiguy)  
          (615) 770-1714 (Corcoran)  
Fax: (615) 532-2910  
[austin.ostiguy@ag.tn.gov](mailto:austin.ostiguy@ag.tn.gov)  
[tyler.corcoran@ag.tn.gov](mailto:tyler.corcoran@ag.tn.gov)

22 *Attorneys for Plaintiff State of Tennessee*

23 David Shatto (Fed. Bar No. 3725697; TX Bar  
No. 24104114)  
Assistant Attorney General  
24 Attorney General for the State of Texas  
Office of the Attorney General  
P.O. Box 12548 (MC-010)  
Austin, TX 78711  
Phone: (512) 463-2185  
Fax: (512) 370-9125  
[David.Shatto@oag.texas.gov](mailto:David.Shatto@oag.texas.gov)

25 *Attorney for Plaintiff State of Texas*

26 Kevin McLean (UT Bar No. 16101)  
Assistant Attorney General  
Utah Attorney General's Office  
160 East 300 South, 5th Floor  
P.O. Box 140872  
Salt Lake City, UT 84114-0872  
Phone: (801) 366-0310  
Fax: (801) 366-0315  
[kmclean@agutah.gov](mailto:kmclean@agutah.gov)

27 *Attorney for Plaintiff Utah Division of  
Consumer Protection*

Edwin L. Hobson (VT Bar No. 637)  
Senior Assistant Attorney General  
Office of the Attorney General  
Consumer Assistance Program  
109 State Street  
Montpelier, VT 05609-1001  
Phone: (802) 863-2000 (Hobson)  
             (802) 828-3171 (Main office)  
Fax:      (802) 304-1014  
[ted.hobson@vermont.gov](mailto:ted.hobson@vermont.gov)  
*Attorney for Plaintiff State of Vermont*

Ashley T. Wentz (WV Bar No. 13486)  
Assistant Attorney General  
West Virginia Attorney General's Office  
Consumer Protection/Antitrust Division  
P.O. Box 1789  
Charleston, WV 25326  
Phone: (304) 558-8986  
Fax: (304) 558-0184  
[Ashley.T.Wentz@wvago.gov](mailto:Ashley.T.Wentz@wvago.gov)  
*Attorney for Plaintiff State of West Virginia  
ex rel. Patrick Morrisey, Attorney General*

8 Geoffrey L. Ward (VA Bar No. 89818)  
9 Senior Assistant Attorney General  
10 Office of the Attorney General of Virginia  
202 N. Ninth St.  
11 Richmond, VA 23219  
12 Phone: (804) 371-0871  
Fax: (804) 786-0122  
13 [gward@oag.state.va.us](mailto:gward@oag.state.va.us)  
14 *Attorney for Plaintiff Commonwealth  
of Virginia, ex rel. Jason S. Miyares,  
Attorney General*

Gregory A. Myszkowski (WI Bar No.  
1050022)  
Assistant Attorney General  
Wisconsin Department of Justice  
P.O. Box 7857  
Madison, WI 53707-7857  
Phone: (608) 266-7656  
Fax: (608) 294-2907  
[myszkowskiga@doj.state.wi.us](mailto:myszkowskiga@doj.state.wi.us)  
*Attorney for Plaintiff State of Wisconsin*

16 Mina Shahin (WA Bar No. 46661)  
17 Alexandra Kory (WA Bar No. 49889)  
18 Assistant Attorneys General  
Washington State Attorney General's Office  
19 800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
20 Phone: (206) 326-5485 (Shahin)  
          (206) 516-2997 (Kory)  
21 Fax: (206) 464-6451  
[Mina.Shahin@atg.wa.gov](mailto:Mina.Shahin@atg.wa.gov)  
[Alexandra.Kory@atg.wa.gov](mailto:Alexandra.Kory@atg.wa.gov)  
22 *Attorneys for Plaintiff State of Washington*

Benjamin M. Peterson (WY Bar No.  
8-6513)  
Assistant Attorney General  
Wyoming Office of the Attorney General  
Kendrick Building  
2320 Capitol Avenue  
Cheyenne, Wyoming 82002  
Phone: (307) 777-8240  
Fax: (307) 777-3435  
[benjamin.peterson2@wyo.gov](mailto:benjamin.peterson2@wyo.gov)  
*Attorney for Plaintiff State of Wyoming*